

SFUND RECORDS CTR
2389459

Comments on Draft Focused Feasibility Study (FFS) United Heckathorn Superfund Site

Levin-Richmond Terminal Corp.

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Discussion Topics

- 1 Big-Picture Comments on Draft FFS
- 2 LRTC Operational Requirements
- 3 Confined Disposal Facility (CDF) Option

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Big-Picture Comments on Draft FFS



Nature and Extent of Sediment Contamination

- Include ALL data, not just 2013 samples
- Delineation of remediation boundary at mouth of Lauritzen Channel
- Delineation of depth of contamination
 - Thickness of Younger Bay Mud (YBM)
 - Potential contamination in Older Bay Mud (OBM)
- Address entire shoreline beneath LRTC Pier
 - Extent of elevated DDT concentrations require addressing entire embankment



Proposed Remedy is not Constructible or Feasible

- Dredging approach insufficient to remove all contaminated sediment
 - Proposed equipment incapable of dredging into OBM
 - Challenges of dredging adjacent to sheet pile (if installed along base of embankment) are not addressed
 - Unstable bulkheads and overhanging docks along western side of channel have not been considered
- Shoreline cap design incompatible with site conditions
 - Steep slopes with irregularly sized rip-rap
 - Obstructions and limited access
 - Need separate designs for head of channel vs. beneath LRTC Pier



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Failure to Address Dredged Material Handling

- No description of dredged material treatment process
- No description of water treatment process
- No viable process location identified
- Feasible transport options not identified
- Disposal facility not identified
- Impact to community not evaluated



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LRTC Operational Requirements



Remedy Must be Compatible with Terminal Operations

- Return B Berth to 1997 elevation of -40 MLLW
 - Post-remediation elevation no shallower than 1997 post-remediation elevation
 - Allow future maintenance dredging of both A and B Berths
- Ship Access
 - No submerged obstructions (i.e, sheet piles or rip rap) that may pose a hazard
- Pier Maintenance
 - Under-pier shoreline cap design compatible with ongoing maintenance



Remedial Construction Must Allow Business to Continue

- Location(s) of dredging support areas not specified in Draft FFS
- Terminal operations incompatible with dredged material treatment on-site
 - Insufficient space for dredged material management and water treatment system
 - Difficulty of constructing containment around rail lines
 - Potential impact to LRTC's upland cap and stormwater system
 - Incompatible with Consent Decree with San Francisco Baykeeper
- Coordination requirements to minimize disruption of area businesses are not specified

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Confined Disposal Facility (CDF)

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Advantages of a Confined Disposal Facility (CDF)

- Proven technology
- Commonly used at Superfund and other sediment sites
- Regulatory concerns have been addressed at other Bay Area sites
- Significantly reduces volume of dredging
 - CDF covers significant volume of contaminated sediment
- Dredged material does not have to be dewatered ex-situ
 - No water treatment plant or water disposal
- Dredged material does not have to be handled upland
 - No piles of contaminated sediment

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Advantages of a Confined Disposal Facility (CDF)

- Minimizes dredge material transport and disposal concerns
- Minimizes potential airborne dust impacts
- Minimizes truck and rail traffic and associated emissions
- Reduces resuspension /redistribution of contamination
- Reduces project cost

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